

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)	
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)	
Unlicensed Operation in the TV Broadcast Bands)	ET Docket No. 04-186
)	
)	
Additional Spectrum for Unlicensed Devices Below 900 MHz and in the 3 GHz Band)	ET Docket No. 02-380
)	
)	

COMMENTS

March 7, 2011

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The Wireless Communications Association International, Inc. (“WCAI”), the trade association of the wireless broadband industry, submits these reply comments in this proceeding.

WCAI supports increasing the maximum height at which fixed TV white space devices (“TVBDs”) can be deployed.¹ Based on its review of the record, WCAI believes that the 76-meter height above average terrain (“HAAT”) limit specified in Sections 15.709(b)(2) and 15.713(e)(6) should be raised to enable consumers, businesses, and schools in rural, hilly parts of the country to receive broadband via white space spectrum, so long as incumbents entitled to interference protection continue to be protected.

Several parties in this proceeding have identified the 76-meter HAAT limit as a significant problem. The problem has been demonstrated by a consortium of seven parties who submitted two maps, one depicting large areas of the country where the rules would bar fixed TVBDs, and the other showing the improvement in available deployment areas if the HAAT limit were raised to 250 meters.² Based on this evidence, WCAI believes that a 250-meter HAAT limit would benefit ISPs and consumers in hilly and mountainous areas and, so long as incumbents can be protected at the same levels, would not harm incumbents.

¹ WCAI has also participated in this proceeding as part of a coalition advocating for the use of a small number of white spaces channels for high-power, licensed backhaul in rural areas. WCAI continues to support this request as well as the HAAT modification requested here.

² See Joint Petition for Partial Reconsideration filed by the Wireless Internet Service Providers Association, *et al.*, ET Docket Nos. 04-186 and 02-380, at Appendix B and Appendix D (filed Jan. 5, 2011).

WCAI also believes that there should be reasonable cap on the height of base station antennas so that ISPs in relatively flat areas do not operate from sites that are too high. The 30-meter above ground limit (“AGL”) suggested by some is probably too low and unduly restrictive. WCAI suggests that antenna heights be restricted to 75 meters AGL. This will afford ISPs more flexibility in deployment, reduce infrastructure costs and, overall, would promote affordable broadband service. At the same time, it would protect incumbents from harmful interference, which would produce a win-win for all parties.

With these changes to the height rules, broadband service can be provided to more rural areas of the country in an affordable, efficient and expeditious manner. WCAI urges the Commission to amend its rules accordingly.

Respectfully submitted,

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